

Draft comments on Derecktor Shipyard Sed Sampling Plan

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C: Parker

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Parker, Stephen

From: Frye, Curtis A. CIV ENGFLDACT NORTHEAST EV23/CF [curtis.frye@navy.mil]
Sent: Wednesday, August 11, 2004 8:20 AM
To: Parker, Stephen; Bober, Todd A CIV ENGFLDACT NORTHEAST
Subject: FW: Draft comments on Derecktor Shipyard Sed Sampling Plan

-----Original Message-----

From: Paul Kulpa [mailto:pkulpa@dem.state.ri.us]
Sent: Tuesday, August 10, 2004 8:57
To: Paul Kulpa; Kymberlee Keckler (E-mail); Frye, Curtis A. CIV ENGFLDACT NORTHEAST EV23/CF; Cornelia Mueller (E-mail)
Subject: Draft comments on Derecktor Shipyard Sed Sampling Plan

Curt,

Attached are comments on Derecktor Shipyard Sed Sampling Plan. Additional comments may follow.

Comments on the

Draft Work Plan Marine Sediment Sampling

for the Former Derecktor Shipyard,

Naval Station Newport

1. Section 1.0, Introduction,

Page 1-3.

"Analysis of Sediments samples using forensic techniques (TPH fingerprinting and extended PAH analysis) to identify probable hydrocarbon contaminant sources."

The Office of Waste Management questions the need to perform a forensic study at the site. A Remedial Investigation, Ecological Risk Assessment, Human Health Risk Assessment and Feasibility Study have already been performed at the site. These studies delineated the areas of contamination, determined the source of contamination, assessed the risk associated with the contamination and proposed remedial alternatives to address the contamination. At this stage in the process the Navy wants to go back to the first step in the remedial investigation phase and ascertain the source of the contamination. These issues have already been addressed and consensus has been reached. The Work Plan has not provided any information supporting a position that the original studies were in error. Therefore, unless the Navy can produce this information, the Office of Waste Management does not approve of the proposed forensic study.

2. Section 1.0, Introduction,

Page 1-3.

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"Analysis of sediments samples using forensic techniques (TPH fingerprinting and extended PAH analysis) to identify probable hydrocarbon contaminant sources."

The Work Plan proposes conducting a forensic analysis for TPH and PAHs. The work plan has not included a section describing how this forensic study will be performed, the standards to be used in the study, the nature of the analysis being performed, the limitations of the study, etc. Obviously, as the needed information was not provided it is not possible to either review or approve the forensic study. Therefore please include a section that provides the necessary details concerning the forensic study.

Be advised that the Office of Waste Management has raised a number of questions concerning the validity of previous forensic studies performed by the Navy. The studies were found to be inadequate and the information generated by the studies could not be used for making decision at the site. Therefore, if the proposed study is of a similar design to the previously rejected studies, the Office of Waste Management will not approve any report based upon these studies or use the information generated from these studies to support decisions for the site.

3. Section 3.2 Sediment Sample Collection,

Page 3-2.

The Work Plan proposes collecting sediment samples from the 0-6 inch interval. As justification for this interval the report should include a table depicting the depths and observed concentration of contaminants observed in the previous studies. This information is needed to ascertain whether the proposed samples will be collected at the correct depth.

4. Section 3.2 Sediment Sample Collection,

Page 3-2.

The Work Plan proposes collecting sediment samples from the 0-6 inch interval. Certain areas may have been deepened or built up as a result of the docking and long term mooring of the aircraft carriers. Therefore, the work plan should specify that samples in the vicinity of the ships will be collected from the 0-6 and 6-12 inch interval.

5. Table3-1, Marine Sediment Sample Locations and Selection Rational,

Page 3-3.

This section of the document calls for the collection of six background samples. The function of the additional sampling effort at Derecktor Shipyard is to ascertain whether the docking of the two aircraft carriers and one battleship, as well as the current use of Pier # 2 has resulted in a redistribution of contamination at the site. The background sample locations were not affected by contamination from Derecktor Shipyard nor were they subject to the berthing of the aforementioned ships. As such, there is no justification for the collection of additional samples at the background station. Therefore, the proposed sampling effort in these areas must be deleted from the report.

6. Table3-1, Marine Sediment Sample Locations and Selection Rational,

Page 3-3.

The function of the proposed sampling effort is to determine whether activities at the site have resulted in a

redistribution of contaminants. In order to address this concern the following sampling stations must be added to the plan:

Collection of four samples on the north side and four samples on the south side of Pier # 2 (Pier used by Coast Guard). Sampling stations should be equally spaced along the length of the pier.

Collection of four samples on the north side and four samples on the south side of Pier # 1 (Inactive ship pier). Sampling stations should be equally spaced along the length of the pier.

Collection of four sample samples along a centerline in between piers 1 and 2.

Paul

8/11/2004